

**UNITED STATES BANKKRUPCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

**In Re:**

**X Case No. 19-32984-JKS**

**Alexander Haselkorn,**

**Debtor**

**X Adversary No. 20-01405-JKS  
(Before Hon. John K. Sherwood)**

**Alexander Haselkorn,**

**Plaintiff,**

**v.**

**David Safir, DLS Billing and  
Consulting Corp  
John Does 1-5,  
Defendants.**

**X**

**Affidavit in Support of Extension of Time to Respond to the Complaint**

State of New York )  
                         )ss:  
County of New York )

I, David Safir under the penalty of perjury respectfully state the following:

1. I am the defendant in this proceeding and DLS Billing and Consulting Corp (DLS) is company.
2. I am based in New York and my company DLS is a New York Corporation.
3. My home address is 245 Exeter St. Brooklyn NY 11235.
4. I do not have any office or home in New Jersey.
5. I have been living under Brooklyn address for 15 years.
6. On July 18, 2020, I left USA for Ukraine.

7. I returned August 2, 2020. Within couple of days of my return I was told by my wife about some letter.

8. I opened the letter and I was shocked to see the summons and that my company and I have been sued in State of New Jersey in a bankruptcy case.

9. Even the facts mentioned in the Complaint are not true and they are twisted.

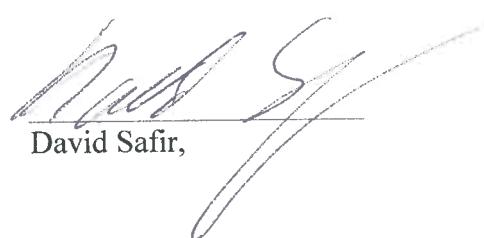
10. I immediately wanted to hire a lawyer. I went around to find a good lawyer. Some of them I knew did not do bankruptcy litigation. I did not know anyone in New Jersey doing bankruptcy litigation. Due to Covid closures, I could not find any one immediately. But I wanted a New York lawyer, because my company is a New York company and also the law controlling my agreement with Doctor Hazelkorn is a New York law.

11. I was referred to Mr. Karamvir Dahiya by another attorney. I have yet to meet him in person. However, I spoke to him on the phone and engaged him just very recently. As stated I have yet to meet him in person. Also, the complaint is bogus. I must meet Mr. Dahiya in person to discuss the case and go over the facts. We request an extension of time to respond to the Complaint at least by 25 days.

12. I request the Court meanwhile no default be entered as the complaint has no merit. I do not see any reason to rush through it. I have to be heard, Your Honor.

Wherefore, I request that the Court grant us 25 day's time or until September 17, 2020 to respond.

Dated: New York NY  
August 20, 2020



David Safir,